



September 30, 2011

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Notice of Ex Parte Conference
Telecommunications Relay Service ("TRS") & Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities
CG Docket No. 10-51

Dear Ms. Dortch:

On Wednesday, September 28, 2011, the undersigned along with Monica Desai from Patton Boggs and Purple executives Dan Luis and John Goodman met with Gregory Hlibok, Diane Mason and Andrew Multiz of the Disability Rights Office. We discussed the need for an industry-wide definition of speed of answer calculations and the need for a codified structure for following up with speed of answer reporting processes and penalty structure. We also discussed the related industry proposal presented to the Commission in 2006 which addressed speed of answer topics. We also briefly discussed Purple's application for re-certification and provided an update on our IP Captioned Telephone Services (IP CTS).

Mr. Luis, Mr. Goodman and I met separately with Angela Kronenberg of Commissioner Clyburn's office, Margaret McCarthy of Commissioner Copp's office and Paul de Sa of the Office of Strategic Planning and Policy Analysis. John Ferron from Purple participated in the meeting with Mr. de Sa by telephone.

In those meetings, we discussed the FCC's pending plans to issue a Notice of Proposed Rulemaking that could change the reimbursement structure for the video relay industry from a per minute basis to a per user basis. We asked the Commission to consider the potential ramifications of such a transition including potential consumer impacts on choice of providers and quality of service.

We re-iterated comments from other providers about the need for a clear road map and smooth transition to avoid abrupt changes to the provider community or the reliability of service received by consumers.

Sincerely,

/s/

Kelby Brick, Esq.
Vice President, Regulatory & Strategic Policy

Cc: Gregory Hlibok
Diane Mason
Andrew Multiz
Angela Kronenberg
Margaret McCarthy
Paul de Sa